

REMARKS

Claims 1-36 are currently pending in the patent application. The Examiner has rejected Claims 1-36 35 USC 102 as anticipated by the Rowney patent. For the reasons set forth below, Applicants respectfully assert that all of the pending claims, as amended, are patentable over the cited prior art.

The present invention is directed to an enterprise-based system for processing transactions wherein a transaction management system automatically creates an electronic transaction comprising an electronic representation of the transaction and at least one verifiable role certificate for each role for which approval is required to be completed to obtain authorization of the transaction. The electronic transaction is then routed to obtain the relevant approvals which comprise completed role certificates, followed by verifying the authenticity of the completed role certificates. The term "role certificate" is a specific term which was defined in the Specification from the bottom of page 8 to the bottom of page 10, and is a certificate which represents the role, and not the person, from which approval must be obtained for authorization of

CH919990042

-18-

the transaction. This very specific role certificate is created, completed, and verified by the present invention as distinguished from prior art approval systems.

In contrast, the Rowney patent teaches a three-step approval system wherein a first computer (the customer computer) submits a name and value pair to an administrative function located on a third computer (the merchant computer); the third computer sends the name and value pair along with identifying certification information to a certification authority on a second computer (a payment gateway); and, the second computer creates a certificate comprising the name and value pair and other certification information. The created certificate is used for authenticating the identity of the customer using the first computer as a party that can pay the stated value. The Rowney patent provides no teachings of verifiable role certificates being included in any of the communications which are passed among the three computers. The Rowney communications may include "certification information" and may result in a "certificate" being rendered by the payment gateway for identifying the customer, but there are no teachings or suggestions of an automatically generated electronic transaction comprising an electronic

CH919990042

-19-

representation of the transaction and at least one verifiable role certificate for each role for which approval is required to be completed to obtain authorization of the transaction.

Under U.S. Patent Law, for a patent to anticipate claim language under 35 USC 102, that patent must teach each and every claim feature. Since the Rowney patent does not teach automatically creating electronic transactions comprising an electronic representation of the transaction and at least one verifiable role certificate for each role for which approval is required to be completed to obtain authorization of the transaction, does not teach the processing of an electronic transaction with role certificates, and does not teach verifying role certificates, it cannot be maintained that the Rowney patent anticipates the invention as claimed. Applicants have amended the language of some of the independent claims to highlight the distinguishing role certificate language, and note that all of the independent claims expressly recite the system, mechanism, and method for creating and processing electronic transactions having role certificates. Applicants therefore conclude that the independent claims, Claims 1, 6, 11, 16, 21, 23, 24, 26, 27, and 32 are all allowable over the Rowney patent. Applicants

CH919990042

-20-

also respectfully point out that claims which depend from allowable claims, and which add limitations thereto, cannot be anticipated by a reference which does not anticipate the independent claims from which they depend. Accordingly, Applicants respectfully assert that Claims 2-5, 7-10, 12-15, 17-20, 22, 25, 28-31, and 33-36 are not anticipated by the Rowney patent.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

H. Ludwig, et al

By:

Anne Vachon Dougherty
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910

CH919990042

-21-